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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

ST. CHARLES HEALTH SYSTEM, INC., an
Oregon nonprofit corporation,

Plaintiff,

v.

OREGON FEDERATION OF NURSES AND
HEALTH PROFESSIONALS, LOCAL 5017,
AFT, AFL-CIO,

Defendants.

Case No. 6:21-cv-00304-MC

ST. CHARLES HEALTH SYSTEM, INC.,
DAVIS WRIGHT TREMAINE LLP AND
MARK HUTCHESON'S JOINT AND
UNOPPOSED MOTION FOR EXTENSION
OF TIME

LR 7-1 CERTIFICATE OF COUNSEL

Counsel for Davis Wright Tremaine LLP and Mark Hutcheson (collectively "DWT parties")
and St. Charles Health System, Inc. ("St. Charles") certify that they conferred with counsel for
Defendants, who does not oppose this motion.

MOTION

Pursuant to Federal Rule of Civil Procedure 6(b)(1), DWT parties and St. Charles respectfully move this Court to issue an Order extending the deadline by which the DWT parties and St. Charles are required to file a responsive pleading to the Motion for Imposition of Sanctions (Dkt. 20) and the Court's Order to Show Cause (Dkt. 24). The current deadline to respond to both the Motion for Imposition of Sanctions and the Court's Order to Show Cause is April 21, 2021. DWT parties and St. Charles respectfully request an additional three weeks (or until May 12, 2021) to prepare responses to the order and motion.

The DWT parties and St. Charles request this extension as counsel were recently retained in this matter and need additional time to investigate the issues before the Court and respond to them.

Defendants do not oppose this motion. This motion is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

DATED this 16th day of April, 2021.

HOLLAND & KNIGHT LLP

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